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SHAWN CORTEZ
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SHAWN CORTEZ,

15 Defendant.
16

Case No. 1:25-cr-00027-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Antonio Pataca, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Shawn Cortez, that the status conference currently
20 scheduled for December 10, 2025, at 1:00 p.m. may be continued to February 25, 2026, at 1:00
21 p.m.

22 The parties agree and stipulate, and request that the Court find the following. Initial
23 discovery has been provided in this matter. The defense has reviewed this discovery, has
24 discussed it with his client, and remains in the process of researching and investigating all
25 aspects of this case. The government has provided a plea agreement and counsel has had initial
26 discussions with Mr. Cortez regarding the proposed agreement. Counsel for Mr. Cortez requires
27 additional time to look into and research issues that may impact resolution and sentencing in this
28 matter and to further discuss the proposed resolution with Mr. Cortez. In order to accomplish

1 this, the parties are in agreement to continue this matter to February 25, 2026, for a further status
2 conference.

3 The requested continuance in this case will conserve time and resources for the parties
4 and the Court. Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny him the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence. The government does not object to the continuance.

7 Based on the above-stated findings, the ends of justice served by continuing the case as
8 requested outweigh the interest of the public and the defendant in a trial within the original date
9 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
10 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period to February
11 25, 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
12 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at
13 defendant's request on the basis of the Court's finding that the ends of justice served by taking
14 such action outweigh the best interest of the public and the defendant in a speedy trial.

15 Respectfully submitted,

16 ERIC GRANT
17 United States Attorney

18 Date: November 26, 2025

/s/ Antonio Pataca
19 ANTONIO PATACA
20 Assistant United States Attorney
21 Attorney for Plaintiff

22 HEATHER E. WILLIAMS
23 Federal Defender

24 Date: November 26, 2025

/s/ Reed Grantham
25 REED GRANTHAM
26 Assistant Federal Defender
27 Attorney for Defendant
28 SHAWN CORTEZ

ORDER

IT IS SO ORDERED. The status conference currently scheduled for December 10, 2025, at 1:00 p.m. is hereby continued to **February 25, 2026, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. The time period from to February 25, 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. **However, in any request for a continuance, the parties shall explain when they will be ready to set a trial date.**

IT IS SO ORDERED.

Dated: November 26, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE